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9 *Attorneys for Plaintiff*

10 THE UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 JOONG MYUNG CHO, individually and
14 derivatively on behalf of CG
PHARMACEUTICALS, INC.

15 Plaintiff,

16 vs.

17 CG INVITES CO., LTD; INCHUL
CHUNG; SOO YEON OH; NEWLAKE
18 INVITES INVESTMENT, LTD.,
NEWLAKE ALLIANCE
MANAGEMENT, LTD.; SEUNG HEE
19 LEE, a/k/a RANDALL LEE; YONG KYU
SHIN; MINKYU LEO KIM.

20 Defendants.
21

22 CG PHARMACEUTICALS, INC.

23 Nominal Defendant.
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27
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Case No. 3:24-cv-07112

**STIPULATION TO EXTEND
PLAINTIFF'S TIME TO RESPOND
TO MOTION TO DISMISS AND TO
EXTEND BRIEFING SCHEDULE**

Judge: The Honorable William H. Orrick

Complaint Filed: October 10, 2024

1 Pursuant to Civil Local Rules 6-1(a), 6-2, and 7-12, Plaintiff Joong Myung Cho,
2 individually and derivatively on behalf of CG Pharmaceuticals, Inc. (“Plaintiff”) and
3 Defendant Minkyu Leo Kim (“Leo Kim”) (collectively, the “Parties”) stipulate to extend
4 the time for Plaintiff to respond to Leo Kim’s Motion to Dismiss and for an extended
5 briefing schedule in connection with any motion to dismiss brought by Leo Kim;

6 WHEREAS, Plaintiff filed its Amended Complaint against Defendants CG Invites
7 Co., Ltd.; Inchul Chung, Soo Yeon Oh; Newlake Invites Investment, Ltd.; Newlake
8 Alliance Management, Ltd.; Seung Hee Lee, a/k/a Randall Lee; Yong Kyu Shin; and Leo
9 Kim (collectively, the “Defendants”) on November 29, 2024 (DKT 16);

10 WHEREAS, Leo Kim filed a Motion to Dismiss All Claims against Plaintiff on
11 December 3, 2024 (DKT 25);

12 WHEREAS, pursuant to Local Rule 6-1(a), Plaintiff and Leo Kim have agreed to
13 extend Plaintiff’s deadline to respond to Leo Kim’s Motion to Dismiss until January 3,
14 2025;

15 WHEREAS, Plaintiff and Leo Kim have agreed to extend Leo Kim’s deadline to
16 oppose any reply by Plaintiff to Leo Kim’s Motion to Dismiss until January 10, 2025;

17 WHEREAS, there has been no other extension in this case;

18 NOW THEREFORE, it is hereby stipulated and agreed between Plaintiff and Leo
19 Kim, through their undersigned counsel, as follows:

20 1. Pursuant to Civil Local Rule 6-1(a), Plaintiff’s deadline to respond to Leo
21 Kim’s Motion to Dismiss is extended until January 3, 2025;

22 2. Pursuant to Civil Local Rule 6-2 and 7-12, and subject to the approval of the
23 Court, the deadline for filing any opposition to Plaintiff’s reply to Leo Kim’s Motion to
24 Dismiss is extended to January 10, 2025;

3. Nothing herein shall be deemed to constitute a waiver of any rights, claims, defenses, motions, or objections that a party may have or make with respect to personal jurisdiction, venue, and/or the claims set forth in this action.

IT IS SO STIPULATED.

Dated: December 16, 2024

MEISTER SEELIG & FEIN PLLC

By: /s/ Austin D. Kim

Austin D. Kim

Attorneys for Plaintiff

Dated: December 16, 2024

ZIPIN, AMSTER & GREENBERG, LLC

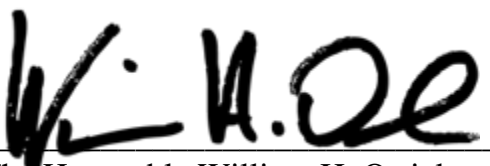
By: /s/ Philip B. Zipin

Phillip B. Zipin

Attorneys for Minkyu Leo Kim

PURSUANT TO STIPULATION, IT IS SO ORDERED. The hearing that was scheduled for January 8, 2025, will be rescheduled for February 5, 2025, at 2:00 PM, via Zoom webinar.

Dated: December 16, 2024


The Honorable William H. Orrick
United States District Judge